

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>09-</u>
v.	:	DATE FILED: October 15, 2009
MIGUEL BELL,	:	VIOLATIONS:
a/k/a "Miggs,"	:	18 U.S.C. § 371 (conspiracy to commit
a/k/a "Miz,"	:	bank fraud and aggravated identity theft
CHRISTOPHER RUSSELL,	:	- 1 count)
a/k/a "Christopher Bishop,"	:	18 U.S.C. § 1344 (bank fraud -8 counts)
KAREEM RUSSELL,	:	18 U.S.C. § 1028A (aggravated identity
a/k/a "Reem,"	:	theft - 34 counts)
MICHAEL MERIN,	:	18 U.S.C. § 2 (aiding and abetting)
TAMIKA BROWN,	:	Notice of forfeiture
a/k/a "Mika"	:	
	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The following banks were financial institutions, insured by the Federal Deposit Corporation:
 - a) Citizens Bank, certificate numbers 57282 and 57957;
 - b) PNC Bank, certificate number 6384;
 - c) Wachovia Bank, certificate number 33869;
 - d) M&T Bank, certificate number 588;
 - e) Provident Bank (now M&T Bank), certificate numbers 15951 and 588;
 - f) SunTrust Bank, certificate number 867;

g) Commerce Bank (now TD Bank), certificate numbers 21140 and 18409;

h) Sovereign Bank, certificate number 29950.

2. From on or about September 1, 2005, through on or about November 30, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”
KAREEM RUSSELL,
a/k/a “Reem,”
MICHAEL MERIN, and
TAMIKA BROWN,
a/k/a “Mika”**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, a bank fraud, in violation of Title 18, United States Code, Sections 1344 and 2, and to knowingly and without lawful authority use a means of identification of another person during and in relation to a bank fraud scheme, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

MANNER AND MEANS

3. It was part of the conspiracy that defendants, MIGUEL BELL, a/k/a “Miggs,” a/k/a “Miz,” CHRISTOPHER RUSSELL, a/k/a “Christopher Bishop,” KAREEM RUSSELL, a/k/a “Reem,” MICHAEL MERIN, and TAMIKA BROWN, a/k/a “Mika,” and others known and unknown to the grand jury used the names, dates of births, addresses, social security numbers, bank account numbers and other means of identification of customers of Citizens Bank, PNC Bank, Wachovia Bank, M&T Bank, Provident Bank, SunTrust Bank,

Commerce Bank, and Sovereign Bank (collectively referred to as “the banks”) to enrich themselves and defraud the banks by posing as customers of the banks at branches of the banks and cashing fraudulent checks made payable to the banks’ customers and withdrawing funds from the customers’ accounts.

It was further a part of the conspiracy that:

ROLE OF DEFENDANT MIGUEL BELL

4. Defendant MIGUEL BELL was the ringleader of a scheme in which bank employees and others were recruited to provide personal identifying information and account numbers of customers of the banks. Other individuals, known as “check runners” were recruited to pose as bank customers and cash fraudulent checks made payable to the customers and withdraw funds from the customers’ accounts. In his capacity as ringleader, defendant BELL performed the following, among other things:

a. he successfully convinced bank employees and an insurance company employee, by pursuing romantic relationships with them, to provide to him confidential bank information, including customers’ account numbers and account balances, and personal identifying information, including names, addresses, dates of birth, social security numbers, and driver’s license numbers, and to rent cars for him to use in accompanying check runners to branches of the banks to conduct fraudulent transactions;

b. he used others, including defendant MICHAEL MERIN and Rashin Owens and David Tunnell, persons known to the grand jury and charged elsewhere, to recruit bank employees and others to provide customers’ bank account numbers and account

balances, and personal identifying information, including names, addresses, dates of birth, social security numbers, and driver's license numbers;

c. he verified high account balances in the bank customers' accounts by calling the banks' automated banking numbers;

d. he arranged to have photographs taken of the check runners for use on fraudulent driver's licenses, and then arranged for the manufacture of fraudulent driver's licenses with a check runner's photograph and a bank customer's name, address, and date of birth;

e. he provided check runners with "cheat-sheets" on which was printed information, such as a bank customer's date of birth, social security number, and other types of identifying information;

f. he provided check runners with bank customers' account information and false photographic identification in the name of the bank customers;

g. he provided check runners with fraudulent checks and instructed the check runners to cash these checks at branches of the banks;

h. he instructed check runners to withdraw funds from the customers' bank accounts at branches of the banks;

i. he decided at which branches of the banks that the check runners would cash fraudulent checks and make fraudulent withdrawals;

j. he arranged transportation, and many times accompanied, in a separate car, defendants CHRISTOPHER RUSSELL, TAMIKA BROWN, and the check runners to and from branches of the banks to conduct the fraudulent transactions;

k. he maintained contact with check runners via cellular phone while the check runners were in the branches of the banks;

l. he received the largest share of the proceeds from the check runners after each transaction at the banks; and

m. he paid the check runners for their services at the end of each day after they cashed the fraudulent checks and made the unauthorized withdrawals.

ROLE OF DEFENDANT CHRISTOPHER RUSSELL

5. Defendant CHRISTOPHER RUSSELL was the “right hand man” of defendant MIGUEL BELL in this scheme. In that capacity, defendant CHRISTOPHER RUSSELL performed the following, among other things:

a. he verified high account balances in the bank customers’ accounts by calling the banks’ automated banking numbers;

b. he recruited check runners, many of whom were drug addicts, and many times provided illegal drugs or money for illegal drugs, to the check runners;

c. he accompanied check runners to have photographs taken for use on fraudulent driver’s licenses;

d. he participated in providing check runners with “cheat-sheets” on which was printed information, such as a bank customer’s date of birth, social security number, and other types of identifying information for the bank customer, by passing the cheat sheets from defendant MIGUEL BELL to the check runners;

e. he participated in providing the check runners with bank customers' account information and false photographic identification in the name of the bank customers by passing the information and false identification from defendant MIGUEL BELL to the check runner;

f. he participated in providing the check runners with fraudulent checks by passing fraudulent checks from defendant MIGUEL BELL to the check runner, he provided additional fraudulent checks to check runners, and he instructed the check runners to cash the fraudulent checks at branches of the banks;

g. he instructed the check runners to withdraw funds from the customers' accounts;

h. he arranged transportation for, and many times accompanied, check runners to and from branches of the banks to conduct the fraudulent transactions;

i. he maintained contact with check runners via cellular phone while the check runners were in branches of the banks;

j. he received the proceeds from the check runners after each transaction at the banks and then passed most of those proceeds to defendant MIGUEL BELL, and split some of the proceeds with defendant TAMIKA BROWN and the check runners; and

k. he participated in paying the check runners for their services at the end of each day after they cashed the fraudulent checks and made the unauthorized withdrawals by receiving the payment from defendant MIGUEL BELL and then giving the payment to the check runners.

ROLE OF DEFENDANT KAREEM RUSSELL

6. Defendant KAREEM RUSSELL was a “middle man” for defendant MIGUEL BELL in this scheme. In that capacity, defendant KAREEM RUSSELL performed the following, among other things:

a. he recruited check runners, many of whom were drug addicts, and many times provided illegal drugs or money for illegal drugs, to the check runners;

b. he accompanied check runners to have photographs taken for use on fraudulent driver’s licenses;

d. he participated in providing check runners with “cheat-sheets” on which was printed information, such as the bank customer’s date of birth, social security number, and other types of identifying information on the bank customer, by passing the cheat sheets from defendant MIGUEL BELL to the check runners;

e. he participated in providing the check runners with bank customers’ account information and false photographic identification in the name of the bank customers by passing the information and false identification from defendant MIGUEL BELL to the check runner;

f. he participated in providing the check runners with fraudulent checks by passing fraudulent checks from defendant MIGUEL BELL to the check runner and he instructed the check runners to cash the fraudulent checks at the banks;

g. he arranged transportation for, and accompanied, check runners to and from branches of the banks to conduct the fraudulent transactions;

h. he received the proceeds from the check runners after each transaction at the banks and then passed those proceeds to defendant MIGUEL BELL; and

i. he participated in paying the check runners for their services at the end of each day after they cashed the fraudulent checks or made the unauthorized withdrawals by receiving the payment from defendant MIGUEL BELL and then giving the payment to the check runners.

ROLE OF DEFENDANT MICHAEL MERIN

7. Defendant MICHAEL MERIN was a “middle man” for defendant MIGUEL BELL in this scheme. In that capacity, defendant MERIN recruited bank employees to provide customers’ bank account numbers and account balances, and personal identifying information, including names, addresses, dates of birth, social security numbers, and driver’s license numbers, and then passed that information onto defendant MIGUEL BELL. In that capacity, defendant MERIN performed the following, among other things:

a. he recruited Citizens Bank employee Jon Steffon, known to the grand jury and charged elsewhere, to provide him with Citizens Bank customer account information;

b. he arranged for check runners to cash large dollar fraudulent checks at the Newtown Square, Pennsylvania branch where Steffon worked, and told Steffon to approve the cashing of those fraudulent checks;

c. he recruited Citizens Bank employee Kern Haynes, known to the grand jury and charged elsewhere, to provide him with Citizens Bank customer account information; and

d. he recruited Citizens Bank employee Marcus Nabried, known to the grand jury and charged elsewhere, to provide him with Citizens Bank customer account information.

ROLE OF DEFENDANT TAMIKA BROWN

8. Defendant TAMIKA BROWN participated in this scheme by performing some or all of the following:

a. she provided clothes to check runners to wear for photographs taken for use on fraudulent driver's licenses and to wear when cashing fraudulent checks at branches of the banks;

b. she accompanied defendant CHRISTOPHER RUSSELL and check runners to have photographs taken for use on fraudulent driver's licenses;

c. she arranged for the rental of cars used in accompanying check runners to branches of the banks to conduct fraudulent transactions; and

d. she accompanied defendant CHRISTOPHER RUSSELL and check runners to and from branches of the banks to conduct the fraudulent transactions;

9. By means of this conspiracy, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, KAREEM RUSSELL, MICHAEL MERIN and TAMIKA BROWN fraudulently obtained and attempted to obtain in excess of \$1,000,000.

OVERT ACTS

In furtherance of the conspiracy, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, KAREEM RUSSELL, MICHAEL MERIN and TAMIKA BROWN, and other

persons known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania, and elsewhere:

Recruitment of Bank Employees

1. From on or about September 1, 2005 to on or about August 7, 2008, defendants MIGUEL BELL and MICHAEL MERIN, with Rashin Owens and David Tunnell, and others, known and unknown to the grand jury, recruited employees of various banks, including Citizens Bank, PNC Bank, and Wachovia Bank, to provide and verify names, addresses, dates of birth, social security numbers, driver's license numbers, account numbers, and account balances of account holders of those banks.

PNC Bank employee Tiffany Brodie

2. From on or about September 1, 2005 to on or about June 30, 2006, an employee of PNC Bank, Tiffany Brodie, a person known to the grand jury and charged elsewhere, provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of approximately four PNC Bank account holders.

3. From on or about May 1, 2006 to on or about June 30, 2006, defendant MIGUEL BELL used the information provided by Tiffany Brodie to acquire and attempt to acquire approximately \$13,050 from PNC Bank by having James Kennedy, known to the grand jury and charged elsewhere, and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with PNC Bank.

4. From on or about March 1, 2006 to on or about June 30, 2006, Tiffany Brodie rented cars for defendant MIGUEL BELL to use in conducting fraudulent transactions at branches of the banks.

Citizens Bank employee Trena Smith

5. From on or about November 1, 2005 to on or about December 20, 2005, an employee of Citizens Bank, Trena Smith, known to the grand jury and charged elsewhere, provided to, and verified for, persons unknown to the grand jury the bank account and personal information of approximately thirty-seven Citizens Bank account holders. That information, including names, addresses, dates of birth, social security numbers, and bank account numbers, was passed on by others, unknown to the grand jury, to defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and KAREEM RUSSELL.

6. From on or about November 1, 2005 to on or about April 30, 2006, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and KAREEM RUSSELL used the information provided by Trena Smith to acquire and attempt to acquire approximately \$390,039 from Citizens Bank by having Ralph Guy, Jennie Hill, Priscilla Torres, all known to the grand jury and charged elsewhere, and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

Citizens Bank employee Jon Steffon

7. From on or about April 1, 2006 to on or about July 30, 2006, an employee of Citizens Bank, Jon Steffon, known to the grand jury and charged elsewhere, provided to, and verified for, defendant MICHAEL MERIN the bank account and personal information of

approximately fourteen Citizens Bank account holders. That information, including names, addresses, dates of birth, social security numbers, and bank account numbers, was then passed on to defendant MIGUEL BELL.

8. From on or about May 1, 2006 to on or about July 30, 2006, defendants MICHAEL MERIN and MIGUEL BELL used the information provided by Jon Steffon to acquire and attempt to acquire approximately \$100,687 from Citizens Bank by having others, known and unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

9. On or about June 10, 2006, defendant MIGUEL BELL possessed hand-written personal information for five Citizens Bank account holders, T.G., D.M., W.J., J.S., and K.K. The personal information for these account holders had been hand-written by Jon Steffon and given to defendant MICHAEL MERIN by Jon Steffon. Defendant BELL also possessed fraudulent identification documents and checks, including fraudulent Pennsylvania driver's licenses in the names of T.G., D.M., and K.K., fraudulent Delaware driver's licenses in the names of W.J. and J.S., fraudulent Citibank MasterCards in the names of T.G., D.M., W.J., J.S., and K.K., and two fraudulent checks made out to K.K.

Citizens Bank employees Jamila Hamler, Marcus Nabried, and Tamea Hill

10. From on or about July 1, 2006 to on or about July 30, 2006, employees of Citizens Bank, Jamila Hamler and Marcus Nabried, persons known to the grand jury and charged elsewhere, provided to, and verified for, defendant MICHAEL MERIN the bank account and personal information of approximately twenty-seven Citizens Bank account holders. That

information, including names, addresses, dates of birth, social security numbers, and bank account numbers, was then passed on to defendant MIGUEL BELL.

11. From on or about July 1, 2006 to on or about September 30, 2006, an employee of Citizens Bank, Tamea Hill, a person known to the grand jury and charged elsewhere, verified for, and provided to, Elton Harris, known to the grand jury and charged elsewhere, and Rashin Owens, the bank account balances of approximately four Citizens Bank account holders. That information was then passed on to defendant MIGUEL BELL.

12. From on or about July 1, 2006 to on or about October 30, 2006, defendants MICHAEL MERIN and MIGUEL BELL used the information provided by Jamila Hamler, Marcus Nabried, and Tamea Hill to acquire and attempt to acquire approximately \$213,145 from Citizens Bank by having James Kennedy and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

Citizens Bank employee Kern Haynes

13. From on or about August 1, 2006 to on or about January 30, 2007, an employee of Citizens Bank, Kern Haynes, a person known to the grand jury and charged elsewhere, provided to, and verified for, defendant MICHAEL MERIN the bank account and personal information of approximately sixteen Citizens Bank account holders. That information, including names, addresses, dates of birth, social security numbers, and bank account numbers, was then passed on to defendants MIGUEL BELL and CHRISTOPHER RUSSELL.

14. From on or about September 1, 2006 to on or about January 30, 2007, defendants MICHAEL MERIN, MIGUEL BELL, and CHRISTOPHER RUSSELL used the information provided by Kern Haynes to acquire and attempt to acquire approximately \$98,375 from Citizens Bank by having Eileen Comire, a person known to the grand jury and charged elsewhere, and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

Citizens Bank employee Regina Tolliver

15. From on or about February 1, 2007 to on or about March 30, 2007, an employee of Citizens Bank, Regina Tolliver, a person known to the grand jury and charged elsewhere, provided to, and verified for, persons unknown to the grand jury the bank account and personal information of approximately seven Citizens Bank account holders. That information, including names, addresses, dates of birth, social security numbers, and bank account numbers, was then passed on to defendants MIGUEL BELL and CHRISTOPHER RUSSELL.

16. From on or about March 1, 2007 to on or about November 30, 2007, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN used the information provided by Regina Tolliver to acquire and attempt to acquire approximately \$181,577 from Citizens Bank by having Richard Maden, a person known to the grand jury and charged elsewhere, and Eileen Comire present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

Citizens Bank employee Deonda Barnett

17. From on or about February 1, 2007 to on or about November 30, 2007, an employee of Citizens Bank, D.B., a person known to the grand jury, provided to, and verified for, James Howard, a person known to the grand jury and charged elsewhere, the bank account and personal information of approximately twelve Citizens Bank account holders, including name, address, date of birth, social security number, and bank account number, and James Howard and others, known and unknown to the grand jury, then passed the bank account and personal information of approximately three Citizens Bank account holders to defendant MIGUEL BELL.

18. From on or about May 1, 2008 to on or about May 30, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN used the information provided by D.B., James Howard, and others to acquire and attempt to acquire approximately \$24,172 from Citizens Bank by having Eileen Comire present fraudulent identification in the name of M.D. to tellers in order to cash fraudulent checks with Citizens Bank.

19. From on or about May 1, 2008 to on or about May 30, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN used the information provided by D.B., James Howard and others to acquire and attempt to acquire approximately \$18,312 from Citizens Bank by having a person, unknown to the grand jury, present fraudulent identification in the names of R.L., H.B. and G.S. to tellers in order to cash fraudulent checks with Citizens Bank.

Citizens Bank employee Clarissa Gavin

20. From on or about March 1, 2007 to on or about April 30, 2007, an employee of Citizens Bank, Clarissa Gavin, a person known to the grand jury and charged elsewhere, provided to, and verified for, Rashin Owens and David Tunnell the bank account and personal information of approximately six Citizens Bank account holders. That information, including names, addresses, dates of birth, social security numbers, and bank account numbers, was then passed on to defendant MIGUEL BELL.

21. From on or about April 1, 2007 to on or about April 30, 2007, defendant MIGUEL BELL and others, known and unknown to the grand jury, used the information provided by Clarissa Gavin to acquire and attempt to acquire approximately \$70,811 from Citizens Bank by having Tommy Antone Murray, a person known to the grand jury and charged elsewhere, Eileen Comire, David Tunnell, and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

Wachovia Bank employee Kyliya Alston

22. From on or about August 1, 2007 to on or about September 30, 2008, an employee of Wachovia Bank, Kyliya Alston, a person known to the grand jury and charged elsewhere, provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of Wachovia Bank account holders and provided defendant BELL with Wachovia Bank business checks.

23. From on or about August 1, 2007 to on or about September 30, 2008, Kyla Alston rented cars for defendant MIGUEL BELL to use in conducting fraudulent transactions at branches of the banks.

Recruitment of Car Dealership Employee

24. From on or about March 1, 2007 to on or about April 30, 2007, Rashin Owens and David Tunnell recruited Damoon Hosseinzadeh, a person known to the grand jury and charged elsewhere, who was an employee of New Concepts, Inc., a car dealership, to provide and verify names, addresses, dates of birth, social security numbers, driver's license numbers, and account numbers of New Concepts, Inc. customers, including account holders of Commerce Bank.

25. From on or about March 1, 2007 to on or about April 30, 2007, Damoon Hosseinzadeh provided to, and verified for, Rashin Owens and David Tunnell the Commerce Bank account and personal information of a New Concepts, Inc. customer. That information, including name, address, date of birth, social security number, and bank account number, was then passed on to defendant MIGUEL BELL.

26. From on or about March 1, 2007 to on or about April 30, 2007, defendant MIGUEL BELL used the information provided by Damoon Hosseinzadeh to acquire and attempt to acquire approximately \$37,900 from Commerce Bank by having David Tunnell present fraudulent identification in the name of that New Concepts, Inc. customer and Commerce Bank account holder to tellers in order to cash fraudulent checks and make fraudulent withdrawals from the account of that Commerce Bank account holder.

Recruitment of Insurance Company Employee

27. From on or about August 1, 2007 to on or about August 30, 2008, defendant MIGUEL BELL recruited a Colonial Penn Insurance Company employee, Lisa Bryant Nelson, a person known to the grand jury and charged elsewhere, to provide and verify names, addresses, dates of birth, social security numbers, driver's license numbers, and account numbers of Colonial Penn Insurance Company customers, who had bank accounts with Citizens Bank, Wachovia Bank, M&T Bank, Provident Bank, and SunTrust Bank.

28. From on or about August 1, 2007 to on or about August 30, 2008, Lisa Nelson provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of approximately ten Citizens Bank account holders.

29. From on or about August 1, 2007 to on or about August 30, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN used the information provided by Lisa Nelson to acquire and attempt to acquire approximately \$33,833 from Citizens Bank by having Eileen Comire and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Citizens Bank.

30. From on or about August 1, 2007 to on or about August 30, 2008, Lisa Nelson provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of approximately twenty-five Wachovia Bank account holders.

31. From on or about August 1, 2007 to on or about August 30, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN used the information provided by Lisa Nelson to acquire and attempt to acquire approximately \$134,935

from Wachovia Bank by having Eileen Comire and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with Wachovia Bank.

32. From on or about August 1, 2007 to on or about August 30, 2008, Lisa Nelson provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of approximately twelve M&T Bank account holders.

33. From on or about August 1, 2007 to on or about August 30, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN used the information provided by Lisa Nelson to acquire and attempt to acquire approximately \$53,085 from M&T Bank by having Eileen Comire and others, unknown to the grand jury, present fraudulent identification in the name of those account holders to tellers in order to cash fraudulent checks with, and make fraudulent withdrawals from, M&T Bank.

34. Between on or about August 1, 2007 and on or about August 30, 2008, Lisa Nelson provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of a Provident Bank account holder.

35. From on or about August 1, 2008 to on or about August 4, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN used the information provided by Lisa Nelson to acquire and attempt to acquire approximately \$7,000 from Provident Bank by having an individual, unknown to the grand jury, present fraudulent identification in the name of that Provident Bank account holder to tellers in order to deposit fraudulent checks and make fraudulent withdrawals from the account of that Provident Bank account holder.

36. Between on or about August 1, 2007 and on or about August 7, 2008, Lisa Nelson provided to, and verified for, defendant MIGUEL BELL the bank account and personal information of a SunTrust Bank account holder.

37. On or about October 2, 2007, defendants MIGUEL BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN used the information provided by Lisa Nelson to acquire and attempt to acquire approximately \$2,250 from SunTrust Bank by having Eileen Comire present fraudulent identification in the name of that SunTrust account holder to the teller in order to make a fraudulent withdrawal from the account of that SunTrust Bank account holder.

38. From on or about August 1, 2007 to on or about August 30, 2008, Lisa Nelson rented cars for defendant MIGUEL BELL to use in conducting fraudulent transactions at branches of the banks.

Fraudulent Transactions by Check Runners

39. From on or about November 1, 2005 through in or about November 30, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and KAREEM RUSSELL, provided Ralph Guy, Jennie Hill, Priscilla Torres, Gregory Grayson, David Tunnell, Richard Maden, Eileen Comire, and James Kennedy, all known to the grand jury, and others, unknown to the grand jury, with necessary means of identification and personal information of customers of banks, including customers of Citizens Bank, PNC Bank, Wachovia Bank, M&T Bank, Provident Bank, SunTrust Bank, Commerce Bank, and Sovereign Bank with fraudulent checks and bank accounts numbers, to permit them to cash fraudulent checks against, or make fraudulent withdrawals from, the accounts of the banks' customers.

40. From on or about November 1, 2005 through in or about November 30, 2008, with means of identification and personal and bank account information provided by defendants MIGUEL BELL, CHRISTOPHER RUSSELL, or KAREEM RUSSELL, Ralph Guy, Jennie Hill, Priscilla Torres, Gregory Grayson, David Tunnell, Richard Maden, Eileen Comire, and James Kennedy, and others pretended to be other people, in order to cash fraudulent checks or make fraudulent withdrawals from the accounts of the banks' customers.

41. From on or about November 1, 2005 through in or about November 30, 2008, Ralph Guy, Jennie Hill, Priscilla Torres, Gregory Grayson, David Tunnell, Richard Maden, Eileen Comire, and James Kennedy, and others, presented the fraudulent identifications and personal and bank account information they received from defendants MIGUEL BELL, CHRISTOPHER RUSSELL, or KAREEM RUSSELL when they asked the bank tellers to process their transactions.

42. From on or about November 1, 2005 through in or about November 30, 2008, after each fraudulent transaction, Ralph Guy, Jennie Hill, Priscilla Torres, Gregory Grayson, David Tunnell, Richard Maden, Eileen Comire, and James Kennedy, and others gave the proceeds to defendants MIGUEL BELL, CHRISTOPHER RUSSELL, or KAREEM RUSSELL.

Check Runner Ralph Guy

43. From on or about November 1, 2005, to on or about February 14, 2006, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL and CHRISTOPHER RUSSELL, Ralph Guy presented approximately thirty-seven fraudulent checks, endorsed on the back with the account number and forged

signature of Citizens Bank account holders at Citizens Bank branches in Pennsylvania, Vermont, Ohio and Michigan. In cashing and attempting to cash these checks, Ralph Guy pretended to be approximately twelve different Citizens Bank account holders, and stole and attempted to steal approximately \$174,046 from Citizens Bank.

Check Runner Jennie Hill

44. From on or about December 1, 2005, to on or about February 14, 2006, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL and CHRISTOPHER RUSSELL, Jennie Hill presented approximately twenty-four fraudulent checks, endorsed on the back with the account number and forged signature of Citizens Bank account holders at Citizens Bank branches in Indiana, New Hampshire, Vermont, Ohio, and Michigan. In cashing and attempting to cash these checks, Jennie Hill pretended to be approximately nine different Citizens Bank account holders, and stole and attempted to steal approximately \$104,422 from Citizens Bank.

Check Runner Priscilla Torres

45. On or about January 6, 2006, at the direction of defendants MIGUEL BELL and KAREEM RUSSELL, and accompanied by defendant KAREEM RUSSELL, Priscilla Torres presented approximately two fraudulent checks, endorsed on the back with the account number and forged signature of a Citizens Bank account holder at Citizens Bank branches in Pennsylvania and Delaware. In cashing these fraudulent checks, Priscilla Torres pretended to be that Citizens Bank account holder and stole approximately \$9,243 from Citizens Bank.

46. From on or about February 13, 2006, to on or about February 14, 2006, Priscilla Torres was paid to be a driver for defendant MIGUEL BELL. On or about February 13, 2006, Priscilla Torres drove a rental car, with defendant BELL as a passenger, from Philadelphia, Pennsylvania to Indiana for the purpose of cashing fraudulent checks at Citizens Bank branches in Indiana. Accompanying Priscilla Torres and defendant BELL on this trip, in a separate car, were check runners Ralph Guy and Jennie Hill and defendant CHRISTOPHER RUSSELL. On or about February 14, 2006, Priscilla Torres drove the rental car, with defendant BELL as a passenger, from Indiana to Philadelphia, Pennsylvania after check runner Jennie Hill was arrested in Indiana while trying to cash a fraudulent check at a Citizens Bank branch.

47. On or about April 5, 2006, Priscilla Torres accompanied defendant KAREEM RUSSELL and Gregory Grayson on a check cashing trip to New Jersey. Defendant KAREEM RUSSELL provided to Priscilla Torres fraudulent identification in the name of, and fraudulent checks made payable to, A.W.

Check Runner Gregory Grayson

48. On or about April 5, 2006, at the direction of defendants MIGUEL BELL and KAREEM RUSSELL, and accompanied by defendant KAREEM RUSSELL and Priscilla Torres, Gregory Grayson presented a fraudulent check, endorsed on the back with the account number and forged signature of a Wachovia Bank account holder at a Wachovia Bank branch in New Jersey. In attempting to cash that fraudulent check, Gregory Grayson pretended to be that Wachovia Bank account holder and attempted to steal approximately \$2,500 from Wachovia Bank.

Check Runner James Kennedy

49. From on or about May 1, 2006, to on or about June 30, 2006, at the direction of defendant MIGUEL BELL, James Kennedy presented approximately four fraudulent checks, endorsed on the back with the account number and forged signature of PNC Bank account holders at PNC Bank branches in Philadelphia, Pennsylvania. In cashing and attempting to cash these checks, James Kennedy pretended to be three different PNC Bank account holders, and stole and attempted to steal approximately \$7,450 from PNC Bank.

50. From on or about July 1, 2006, to on or about August 30, 2006, at the direction of defendant MIGUEL BELL, James Kennedy presented approximately twenty fraudulent checks, endorsed on the back with the account number and forged signature of Citizens Bank account holders at Citizens Bank branches in Pennsylvania and Delaware. In cashing and attempting to cash these checks, James Kennedy pretended to be eleven different Citizens Bank account holders, and stole and attempted to steal approximately \$61,600 from PNC Bank.

Check Runner Eileen Comire

51. From on or about August 1, 2006 to on or about August 7, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented approximately thirty-seven fraudulent checks, endorsed on the back with the account number and forged signature of, and approximately twenty-four unauthorized withdrawal slips with the name and account number of, Wachovia Bank account holders. In cashing these and attempting to cash these checks, and making and attempting to make these withdrawals, Eileen

Comire pretended to be approximately twenty-seven different Wachovia Bank account holders, and stole and attempted to steal approximately \$240,599 from Wachovia Bank.

52. From on or about October 1, 2006, to on or about August 7, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented approximately eighty-eight fraudulent checks, endorsed on the back with the account number and forged signature of Citizens Bank account holders at Citizens Bank branches in Pennsylvania, Delaware, and New York. In cashing and attempting to cash these fraudulent checks, Eileen Comire pretended to be approximately twenty-one different Citizens Bank account holders, and stole and attempted to steal approximately \$186,913 from Citizens Bank.

53. From on or about October 1, 2007 to on or about August 7, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented approximately twenty-two fraudulent checks, endorsed on the back with the account number and forged signature of M&T Bank account holders. In cashing these fraudulent checks, Eileen Comire pretended to be approximately twelve different M&T Bank account holders, and stole and attempted to steal approximately \$58,135 from M&T Bank.

54. From on or about October 1, 2007 to on or about October 30, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented fraudulent checks drawn on the M&T Bank account of Screenco Screening. In cashing

these fraudulent checks against the M&T Bank account of Screenco Screening, Eileen Comire pretended to be other people and stole approximately \$7,405 from M&T Bank.

55. On or about October 2, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented a fraudulent check, endorsed on the back with the account number and forged signature of a SunTrust Bank account holder. In cashing this fraudulent check, Eileen Comire pretended to be that SunTrust account holder, and stole approximately \$2,250 from SunTrust Bank.

56. From on or about November 1, 2007 to on or about November 30, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented fraudulent checks and drawn on the M&T Bank account of Teamworld, Inc. In cashing these fraudulent checks against the M&T Bank account of Teamworld, Inc., Eileen Comire pretended to be other people and stole approximately \$10,770 from M&T Bank.

57. From on or about May 1, 2008 to on or about May 30, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN, Eileen Comire presented fraudulent checks drawn on the M&T Bank account of American Independent Insurance Company. In cashing these fraudulent checks against the M&T Bank account of American Independent Insurance Company, Eileen Comire pretended to be another person and stole approximately \$2,533 from M&T Bank.

Check Runner David Tunnell

58. From on or about March 1, 2007 to on or about May 30, 2007, at the direction of defendant MIGUEL BELL, and accompanied by defendant BELL, David Tunnell presented approximately seven unauthorized withdrawal slips with the account number of Commerce Bank account holders at Commerce Bank branches in New Jersey. In making and attempting to make these unauthorized withdrawals, David Tunnell pretended to be two different Commerce Bank account holders, and stole and attempted to steal approximately \$41,900 from Commerce Bank.

59. From on or about April 1, 2007 to on or about April 30, 2007, at the direction of defendant MIGUEL BELL, and accompanied by defendant BELL, David Tunnell presented approximately six unauthorized withdrawals slips, using the name and account number of Citizens Bank account holders, and a fraudulent check, endorsed on the back with the account number and forged signature of a Citizens Bank account holder at Citizens Bank branches in Pennsylvania and New York. In making these fraudulent withdrawals, and attempting to cash that fraudulent check, David Tunnell pretended to be approximately three different Citizens Bank account holders, and stole and attempted to steal approximately \$45,100 from Citizens Bank.

Check Runner Richard Maden

60. From on or about April 1, 2007 to on or about February 28, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL and CHRISTOPHER RUSSELL, Richard Maden presented approximately twenty-nine fraudulent checks, endorsed on the back with the account number and forged signature of Citizens Bank account holders at Citizens Bank branches in Pennsylvania, New

York, and Delaware. In cashing and attempting to cash these fraudulent checks, Richard Maden pretended to be approximately five different Citizens Bank account holders, and stole and attempted to steal approximately \$97,374 from Citizens Bank.

61. On or about December 19, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL and CHRISTOPHER RUSSELL, Richard Maden presented a fraudulent check, endorsed on the back with the account number and forged signature of a Wachovia Bank account holder at a Wachovia Bank branch in Maryland. In cashing that fraudulent check, Richard Maden pretended to be the Wachovia Bank account holder, and stole approximately \$2,008 from Wachovia Bank.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 5, and 8, and Overt Acts 1, 2 through 4, 39 through 42, 49, and 50 of Count One are incorporated here.
2. From on or about September 1, 2005, to on or about September 30, 2007 in the Eastern District of Pennsylvania, and elsewhere, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
CHRISTOPHER RUSSELL,
a/k/a "Christopher Bishop," and
TAMIKA BROWN,
a/k/a "Mika"**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud PNC Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. With information provided by PNC Bank employee Tiffany Brodie and others to defendants MIGUEL BELL and others, defendants BELL and CHRISTOPHER RUSSELL directed James Kennedy, Eileen Comire, and others in posing as PNC Bank customers in order to cash fraudulent checks and make unauthorized withdrawals.
2. From on or about June 1, 2006 to on or about June 30, 2006, James Kennedy used stolen account information and false identification documents of Citizens Bank account holders provided to him by defendant MIGUEL BELL to fraudulently withdraw money

from the accounts of those PNC Bank account holders, and share the proceeds with defendant BELL and others.

3. In furtherance of the scheme, from on or about June 1, 2006 to on or about June 30, 2006, at the direction of defendant MIGUEL BELL, James Kennedy cashed or attempted to cash fraudulent checks at PNC Bank branches in Pennsylvania and Delaware.

4. From on or about September 1, 2007 to on or about September 30, 2007, Eileen Comire used stolen account information and false identification documents of a PNC Bank account holder provided to her by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of that PNC Bank account holder, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN.

5. From on or about September 1, 2007 to on or about September 30, 2007, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN provided Eileen Comire with transportation from Philadelphia, Pennsylvania to PNC Bank branches in Maryland for the purpose of fraudulently withdrawing money from the account of a PNC Bank account holder

6. In furtherance of the scheme, from on or about September 1, 2007 to on or about September 30, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, and others, Eileen Comire cashed and attempted to cash fraudulent checks at PNC Bank branches in Maryland.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 3 through 8, and Overt Acts 1, 5 through 21, 27 through 29, 39 through 46, 50, 52, 59, and 60 of Count One are incorporated here.
2. From on or about November 1, 2005, to on or about November 30, 2008 in the Eastern District of Pennsylvania, the District of Delaware, and elsewhere, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
CHRISTOPHER RUSSELL,
a/k/a "Christopher Bishop,"
KAREEM RUSSELL,
a/k/a "Reem,"
MICHAEL MERIN, and
TAMIKA BROWN,
a/k/a "Mika"**

knowingly executed, and attempted to execute, and aided an abetted the execution of, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. With information provided by Citizens Bank employees Trena Smith, Jon Steffon, Kern Haynes, Jamila Hamler, Marcus Nabried, Tamea Hill, Regina Tolliver, and D.B., Colonial Penn Insurance Company employee Lisa Bryant Nelson, and others to defendants MIGUEL BELL and MICHAEL MERIN and others, defendants BELL, CHRISTOPHER RUSSELL, and KAREEM RUSSELL directed Ralph Guy, Jennie Hill, Priscilla Torres, David Tunnell, Richard Maden, Eileen Comire, and others in posing as Citizens Bank customers in order to cash fraudulent checks and make unauthorized withdrawals.

2. From on or about November 1, 2005 to on or about February 14, 2006, Ralph Guy used stolen account information and false identification documents of Citizens Bank account holders provided to him by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendants BELL and CHRISTOPHER RUSSELL.

3. From on or about November 1, 2005 to on or about February 14, 2006, defendants MIGUEL BELL and CHRISTOPHER RUSSELL provided Ralph Guy with transportation from Philadelphia, Pennsylvania to Citizens Bank branches in Pennsylvania, Delaware, Vermont, Ohio, Michigan and Indiana for the purpose of fraudulently withdrawing money from the account of Citizens Bank account holders, some of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

4. In furtherance of the scheme, from on or about November 18, 2005 to on or about February 14, 2006, at the direction of, and accompanied by, defendants MIGUEL BELL and CHRISTOPHER RUSSELL and others, Ralph Guy cashed and attempted to cash fraudulent checks at Citizens Bank branches in Pennsylvania, Delaware, Vermont, Ohio, Michigan, and Indiana.

5. From on or about December 1, 2005 to on or about February 14, 2006, Jennie Hill used stolen account information and false identification documents of Citizens Bank account holders provided to her by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendants BELL and CHRISTOPHER RUSSELL.

6. From on or about December 1, 2005 to on or about February 14, 2006, defendants MIGUEL BELL and CHRISTOPHER RUSSELL provided Jennie Hill with transportation from Philadelphia, Pennsylvania to Citizens Bank branches in Vermont, New Hampshire, Ohio, Michigan and Indiana for the purpose of fraudulently withdrawing money from the account of Citizens Bank account holders, some of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

7. In furtherance of the scheme, from on or about December 1, 2005 to on or about February 14, 2006, at the direction of, and accompanied by, defendants MIGUEL BELL and CHRISTOPHER RUSSELL and others, Jennie Hill cashed and attempted to cash fraudulent checks at Citizens Bank branches in Vermont, New Hampshire, Ohio, Michigan, and Indiana.

8. On or about January 6, 2006, Priscilla Torres used stolen account information and false identification documents of a Citizens Bank account holder provided to her by defendants MIGUEL BELL and KAREEM RUSSELL to fraudulently withdraw money from the account of that Citizens Bank account holder, and share the proceeds with defendants BELL and KAREEM RUSSELL.

9. On or about January 6, 2006, defendant KAREEM RUSSELL provided Priscilla Torres with transportation from Philadelphia, Pennsylvania to Citizens Bank branches in Pennsylvania and Delaware for the purpose of fraudulently withdrawing money from the account of a Citizens Bank account holder, who had an account with a Citizens Bank branch within the Eastern District of Pennsylvania.

10. In furtherance of the scheme, on or about January 6, 2006, at the direction of defendants MIGUEL BELL and KAREEM RUSSELL and accompanied by defendant KAREEM RUSSELL, Priscilla Torres cashed fraudulent checks at Citizens Bank branches in Pennsylvania and Delaware.

11. From on or about July 1, 2006 to on or about August 30, 2006, James Kennedy used stolen account information and false identification documents of Citizens Bank account holders provided to him by defendant MIGUEL BELL to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendant BELL.

12. In furtherance of the scheme, at the direction of defendant MIGUEL BELL, from on or about July 1, 2006 to on or about August 30, 2006, James Kennedy cashed and attempted to cash fraudulent checks at Citizens Bank branches in Pennsylvania and Delaware against the accounts of Citizens Bank account holders, some of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

13. From on or about October 1, 2006 to on or about August 7, 2008, Eileen Comire used stolen account information and false identification documents of Citizens Bank account holders provided to her by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN.

14. From on or about October 1, 2006 to on or about August 7, 2008, defendants MIGUEL BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN provided Eileen Comire with transportation from Philadelphia, Pennsylvania to Citizens Bank branches in

Pennsylvania, New Jersey, New York, and Ohio for the purpose of fraudulently withdrawing money from the accounts of Citizens Bank account holders, some of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

15. In furtherance of the scheme, from on or about October 1, 2006 to on or about August 7, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, and others, Eileen Comire cashed and attempted to cash fraudulent checks, and attempted to make fraudulent withdrawals, at Citizens Bank branches in Pennsylvania, New Jersey, New York, and Ohio.

16. From on or about April 1, 2007 to on or about April 30, 2007, David Tunnell used stolen account information and false identification documents of Citizens Bank account holders provided to him by defendant MIGUEL BELL to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendants BELL.

17. From on or about April 1, 2007 to on or about April 30, 2007, defendant MIGUEL BELL provided David Tunnell with transportation from Philadelphia, Pennsylvania to Citizens Bank branches in Pennsylvania and New York for the purpose of fraudulently withdrawing money from the accounts of Citizens Bank account holders, all of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

18. In furtherance of the scheme, from on or about April 1, 2007 to on or about April 30, 2007, at the direction of, and accompanied by, defendant MIGUEL BELL, David

Tunnell attempted to cash fraudulent checks, and made and attempted to make fraudulent withdrawals, at Citizens Bank branches in Pennsylvania and New York.

19. From on or about April 1, 2007 to on or about February 28, 2008, Richard Maden used stolen account information and false identification documents of Citizens Bank account holders provided to him by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendants BELL and CHRISTOPHER RUSSELL.

20. In furtherance of the scheme, from on or about April 1, 2007 to on or about February 28, 2008, at the direction of, and accompanied by, defendants MIGUEL BELL, CHRISTOPHER RUSSELL, TAMIKA BROWN, and others, Richard Maden cashed or attempted to cash fraudulent checks, and attempted to make fraudulent withdrawals, at Citizens Bank branches in Pennsylvania, Delaware, and New York from the accounts of Citizens Bank account holders, some of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

21. From on or about November 1, 2005 to on or about November 30, 2008, other individuals, unknown to the grand jury, used stolen account information and false identification documents of Citizens Bank account holders provided to them by defendant MIGUEL BELL and others to fraudulently withdraw money from the accounts of those Citizens Bank account holders, and share the proceeds with defendants BELL and others.

22. In furtherance of the scheme, from on or about November 1, 2005 to on or about November 30, 2008, at the direction of defendant MIGUEL BELL and others, other individuals cashed and attempted to cash fraudulent checks, and made and attempted to make

fraudulent withdrawals, at Citizens Bank branches in Pennsylvania, Delaware, New York, Ohio, Rhode Island, Vermont, Connecticut, New Hampshire, and Massachusetts from the accounts of Citizens Bank account holders, some of whom had accounts with Citizens Bank branches within the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 6, and 8, and Overt Acts 1, 22, 27, 30, 31, 39 through 42, 48, 51, and 61 of Count One are incorporated here.

2. From on or about April 5, 2006 to on or about August 7, 2008 in the Eastern District of Pennsylvania, the District of Delaware, and the District of Maryland, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
CHRISTOPHER RUSSELL,
a/k/a "Christopher Bishop,"
KAREEM RUSSELL,
a/k/a "Reem,"
and
TAMIKA BROWN,
a/k/a "Mika"**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Wachovia Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. From on or about April 5, 2006 to on or about September 30, 2008, with information provided by Wachovia Bank employee Kyla Alston, Colonial Penn Insurance Company employee Lis Bryant Nelson and others to defendants MIGUEL BELL and others, defendants BELL and CHRISTOPHER RUSSELL directed Gregory Grayson, Eileen Comire, and Richard Maden in posing as Wachovia Bank customers in order to cash fraudulent checks and make unauthorized withdrawals.

2. On or about April 5, 2006, Gregory Grayson used stolen account information and false identification documents of a Wachovia Bank account holder provided to him by defendants MIGUEL BELL and KAREEM RUSSELL to fraudulently withdraw money from the account of that Wachovia Bank account holder, and share the proceeds with defendants BELL and KAREEM RUSSELL.

3. On or about April 5, 2006, defendant KAREEM RUSSELL provided Gregory Grayson and Priscilla Torres with transportation from Philadelphia, Pennsylvania to New Jersey for the purpose of fraudulently withdrawing money from the account of a Wachovia Bank account holder.

4. In furtherance of the scheme, on or about April 5, 2006, at the direction of defendants MIGUEL BELL and KAREEM RUSSELL, and accompanied by defendant KAREEM RUSSELL and Priscilla Torres, Gregory Grayson attempted to cash a fraudulent check at a Wachovia Bank branch in New Jersey against the account of a Wachovia Bank account holder, who had an account at a Wachovia Bank branch within the Eastern District of Pennsylvania.

5. From on or about August 1, 2007 to on or about August 7, 2008, using her position with Colonial Penn Insurance Company in Philadelphia, Pennsylvania, Lisa Bryant Nelson accessed the bank account and customer information for Colonial Penn Insurance company customers who were also Wachovia Bank account holders, and passed that information onto defendant MIGUEL BELL.

6. From on or about August 1, 2007 to on or about September 30, 2008, using her position with Wachovia Bank in Philadelphia, Pennsylvania, Kyia Alston accessed the bank account and customer information for Wachovia Bank account holders and passed that information onto defendant MIGUEL BELL.

7. From on or about September 1, 2007 to on or about August 7, 2008, Eileen Comire used stolen account information and false identification documents of Wachovia Bank account holders provided to her by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of those Wachovia Bank account holders, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN.

8. From on or about October 1, 2007 to on or about September 30, 2008, defendants CHRISTOPHER RUSSELL and TAMIKA BROWN provided Eileen Comire and others with transportation from Philadelphia, Pennsylvania to Maryland and Delaware for the purpose of fraudulently withdrawing money from the accounts of Wachovia Bank account holders.

9. In furtherance of the scheme, from on or about September 1, 2007 to on or about August 7, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, and others, Eileen Comire cashed and attempted to cash fraudulent checks at Wachovia Bank branches in Maryland and Delaware against the accounts of those Wachovia Bank account holders, several of whom had accounts at Wachovia Bank branches within the Eastern District of Pennsylvania.

10. On or about December 19, 2007, Richard Maden used stolen account information and false identification documents of a Wachovia Bank account holder provided to him by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the account of that Wachovia Bank account holder, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN.

11. In furtherance of the scheme, on or about December 19, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, Richard Maden cashed a fraudulent check at a Wachovia Bank branch in Maryland.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 5, and 8, and Overt Acts 27, 32, 33, 39 through 42, 53, 54, 56, and 57 of Count One are incorporated here.

2. From on or about August 1, 2007, to on or about August 7, 2008 in the Eastern District of Pennsylvania, the District of Delaware, and the District of Maryland, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
CHRISTOPHER RUSSELL,
a/k/a "Christopher Bishop,"
and
TAMIKA BROWN,
a/k/a "Mika"**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud M&T Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. From on or about August 1, 2007, to on or about August 7, 2008, with information provided by Colonial Penn Insurance Company employee Lisa Bryant Nelson and others to defendant MIGUEL BELL, defendants BELL and CHRISTOPHER RUSSELL directed Eileen Comire and others in posing as M&T Bank customers and others in order to cash fraudulent checks and make unauthorized withdrawals.

2. From on or about August 1, 2007 to on or about August 7, 2008, using her position with Colonial Penn Insurance Company in Philadelphia, Pennsylvania, Lisa Bryant

Nelson accessed the bank account and customer information for Colonial Penn Insurance company customers who were also M&T Bank account holders, and passed that information onto defendant MIGUEL BELL.

3. From on or about October 1, 2007 to on or about August 7, 2008, defendants CHRISTOPHER RUSSELL and TAMIKA BROWN provided Eileen Comire and others with transportation from Philadelphia, Pennsylvania to Maryland and Delaware for the purpose of fraudulently withdrawing money from the accounts of M&T Bank account holders.

4. From on or about October 1, 2007 to on or about August 7, 2008, Eileen Comire and others used stolen account information and false identification documents of the M&T Bank account holders and other individuals provided to them by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the accounts of those M&T Bank individual account holders and the accounts of M&T corporate customers, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN.

5. In furtherance of the scheme, from on or about October 1, 2007 to on or about August 7, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, Eileen Comire and others cashed and attempted to cash fraudulent checks, and made and attempted to make fraudulent withdrawals from M&T Bank branches in Maryland and Delaware.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 5, and 8, and Overt Acts 27, 34, 35, and 39 through 42 of Count One are incorporated here.
2. From or about August 1, 2007, to on or about August 4, 2008 in the Eastern District of Pennsylvania and the District of Maryland, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
CHRISTOPHER RUSSELL,
a/k/a "Christopher Bishop,"
and
TAMIKA BROWN,
a/k/a "Mika"**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Provident Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. With information provided by Colonial Penn Insurance Company employee Lisa Bryant Nelson to defendant MIGUEL BELL, defendants BELL and CHRISTOPHER RUSSELL directed a person, unknown to the grand jury, in posing as a Provident Bank customer in order to cash fraudulent checks and make unauthorized withdrawals.
2. From on or about August 1, 2007 to on or about August 4, 2008, using her position with Colonial Penn Insurance Company in Philadelphia, Pennsylvania, Lisa Bryant Nelson accessed the bank account and customer information for a Colonial Penn Insurance

company customer who was also a Provident Bank account holder, and passed that information onto defendant MIGUEL BELL.

3. That unknown person used stolen account information and false identification documents of a Provident Bank account holder provided to him by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the account of that Provident Bank account holder, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN.

4. In furtherance of the scheme, from on or about August 1, 2008 to on or about August 4, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, that unknown person cashed fraudulent checks and made fraudulent withdrawals at Provident Bank branches in Maryland.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 5, and 8, and Overt Acts 27, 36, 37, 39 through 42, and 55 of Count One are incorporated here.

2. From on or about August 1, 2007, to on or about October 2, 2007 in the Eastern District of Pennsylvania and the District of Maryland, defendants

**MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”
and
TAMIKA BROWN,
a/k/a “Mika”**

knowingly executed, and attempted to execute, and aided an abetted the execution of, a scheme to defraud SunTrust Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. With information provided by Colonial Penn Insurance Company employee Lisa Bryant Nelson to defendant MIGUEL BELL, defendants BELL and CHRISTOPHER RUSSELL directed Eileen Comire in posing as a SunTrust Bank customer in order to cash fraudulent checks and make fraudulent withdrawals.

2. From on or about August 1, 2007 to on or about October 2, 2007, using her position with Colonial Penn Insurance Company in Philadelphia, Pennsylvania, Lisa Bryant Nelson accessed the bank account and customer information for a Colonial Penn Insurance

company customer who was also a SunTrust Bank account holder, and passed that information onto defendant MIGUEL BELL.

3. On or about October 2, 2007, defendants CHRISTOPHER RUSSELL and TAMIKA BROWN provided Eileen Comire with transportation from Philadelphia, Pennsylvania to Maryland for the purpose of fraudulently withdrawing money from the account of the SunTrust Bank account holder.

4. On or about October 2, 2007, Eileen Comire used stolen account information and false identification documents of the SunTrust Bank account holder provided to her by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the account of that SunTrust Bank account holder, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN.

5. In furtherance of the scheme, on or about October 2, 2007, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSELL, and accompanied by defendants BELL, CHRISTOPHER RUSSELL, and TAMIKA BROWN, Eileen Comire cashed a fraudulent check at a SunTrust Bank branch in Maryland.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 and 4, and Overt Acts 24 through 26, 39 through 42, and 58 of Count One are incorporated here.

2. From on or about March 1, 2007, to on or about May 30, 2007 in the Eastern District of Pennsylvania and the District of New Jersey, defendant

**MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Commerce Bank, now known as TD Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. With information provided by New Concepts, Inc. car dealership employee Damoon Hosseinzadeh to Rashin Owens and David Tunnell, and defendant MIGUEL BELL, defendant BELL directed David Tunnell in posing as Commerce Bank customers in order to cash fraudulent checks and make fraudulent withdrawals.

2. From on or about March 1, 2007 to on or about April 30, 2007, using his position with New Concepts, Inc. in Conshohocken, Pennsylvania, Damoon Hosseinzadeh accessed the bank account and customer information for a New Concepts, Inc. customer who was also a Commerce Bank account holder, and passed that information onto Rashin Owens, who, in turn, provided that information to defendant MIGUEL BELL.

3. From on or about March 1, 2007 to on or about May 30, 2007, Tunnell used stolen account information and false identification documents of Commerce Bank account holders provided to him by defendant MIGUEL BELL to fraudulently withdraw money from the accounts of those Commerce Bank account holders, and share the proceeds with defendant BELL.

4. From on or about March 1, 2007 to on or about May 30, 2007, defendant MIGUEL BELL provided David Tunnell with transportation from Philadelphia, Pennsylvania to New Jersey for the purpose of fraudulently withdrawing money from the account of Commerce Bank account holders.

5. In furtherance of the scheme, from on or about March 1, 2007 to on or about May 30, 2007, at the direction of defendant MIGUEL BELL, and accompanied by defendant BELL, David Tunnell made and attempted to make fraudulent withdrawals at Commerce Bank branches in New Jersey, against the accounts of Commerce Bank account holders who had accounts with Commerce Bank branches within the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3 through 5, and 8, and Overt Acts 39 through 42 of Count One are incorporated here.

2. From on or about November 25, 2008 to or November 26, 2008, in the Eastern District of Pennsylvania and the District of Maryland, defendant

**MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”
and
TAMIKA BROWN,
a/k/a “Mika”**

knowingly executed, and attempted to execute, and aided and abetted the execution of, a scheme to defraud Sovereign Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

1. With information provided to defendant MIGUEL BELL, defendants BELL and CHRISTOPHER RUSSELL directed a person unknown to the grand jury in posing as a Sovereign Bank customer in order to cash fraudulent checks and make fraudulent withdrawals.

2. That unknown person used stolen account information and false identification documents of the Sovereign Bank account holder provided to her by defendants MIGUEL BELL and CHRISTOPHER RUSSELL to fraudulently withdraw money from the account of the Sovereign Bank account holder, and share the proceeds with defendants BELL, CHRISTOPHER RUSSELL and TAMIKA BROWN.

3. In furtherance of the scheme, from on or about November 25, 2008 to on or about November 26, 2008, at the direction of defendants MIGUEL BELL and CHRISTOPHER RUSSEL, that unknown person cashed fraudulent checks at Sovereign Bank branches in Maryland against the account of a Sovereign Bank account holder who had an account at a Sovereign Bank branch within the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 through 5, 7, and 8, and Overt Acts 1, 13, 14, 39 through 42, and 52 of Count One are incorporated here.
2. On or about November 9, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”
MICHAEL MERIN,
and
TAMIKA BROWN,
a/k/a “Mika”**

knowingly and without lawful authority, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of another person, that is, the name and identifying information of A.R., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNTS ELEVEN THROUGH TWENTY**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 3 through 5, and Overt Acts 1, 5, 6, and 39 through 45 of Count One are incorporated here.

2. From on or about November 9, 2005 through in or about February 14, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
and
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”

knowingly and without lawful authority, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>	<u>BANK</u>
11	12/04/05	T.M.	Citizens Bank
12	12/05/05	R.D.	Citizens Bank
13	01/12/06	S.E.	Citizens Bank
14	01/13/06	J.L.	Citizens Bank
15	01/13/06	J.Sa.	Citizens Bank
16	02/02/06	A.B.	Citizens Bank
17	02/02/06	C.C.	Citizens Bank
18	02/03/06	A.W.	Citizens Bank
19	02/14/06	R.F.	Citizens Bank

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>	<u>BANK</u>
20	02/14/06	D.D.	Citizens Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

COUNTS TWENTY-ONE THROUGH THIRTY-THREE**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 3 through 5, and 8, and Overt Acts 1, 15, 16, 20, 21, 27 through 29, 39 through 42, 51, 52, and 55 of Count One are incorporated here.

2. From on or about February 1, 2007 through in or about August 7, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendants

MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”
and
TAMIKA BROWN,
a/k/a “Mika,”

knowingly and without lawful authority, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>	<u>BANK</u>
21	03/01/07	S.M.	Citizens Bank
22	03/01/07	M.R.	Citizens Bank
23	04/02/07	V.T.	Citizens Bank
24	04/25/07	C.B.	Citizens Bank
25	02/01/08	E.F.	Citizens Bank
26	03/21/08	L.C.	Citizens Bank
27	05/23/08	B.H.	Citizens Bank
28	08/07/08	E.S.	Citizens Bank

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>	<u>BANK</u>
29	10/02/07	R.H.	SunTrust Bank_____
30	10/26/07	V.C.	Wachovia Bank
31	12/19/07	B.W.	Wachovia Bank
32	12/21/07	M.Ca.	Wachovia Bank
33	11/25/08	M.Cl.	Sovereign Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

COUNTS THIRTY-FOUR THROUGH FORTY-ONE**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 3, 4 and 7, and Overt Acts 1, 7 through 12, 39 through 42, and 50 of Count One are incorporated here.

2. From on or about July 14, 2006 through in or about June 9, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
and
MICHAEL MERIN**

knowingly and without lawful authority, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

COUNT	DATE	ACCOUNT HOLDER	BANK
34	06/09/06	T.G.	Citizens Bank
35	06/09/06	D.M.	Citizens Bank
36	06/09/06	W.J.	Citizens Bank
37	06/09/06	J.St.	Citizens Bank
38	07/14/06	J.W.	Citizens Bank
39	07/21/06	T.N.	Citizens Bank
40	07/21/06	D.M.	Citizens Bank
41	08/14/06	J.N.	Citizens Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

COUNTS FORTY-TWO THROUGH FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3, 4 and 6, and Overt Acts 1, 5, 6, 39 through 42, 45, and 48 of Count One are incorporated here.

2. From on or about January 6, 2006 through in or about April 5, 2006, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MIGUEL BELL,
a/k/a "Miggs,"
a/k/a "Miz,"
and
KAREEM RUSSELL,
a/k/a/ "Reem,"**

knowingly and without lawful authority, possessed and used, and aided and abetted the transfer, possession, and use of, a means of identification of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>	<u>BANK</u>
42	01/06/06	A.B.	Citizens Bank
43	04/05/06	F.J.	Wachovia Bank

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371 and 1344, set forth in Counts One through Nine of this indictment, defendants

**MIGUEL BELL,
a/k/a “Miggs,”
a/k/a “Miz,”
CHRISTOPHER RUSSELL,
a/k/a “Christopher Bishop,”
KAREEM RUSSELL,
a/k/a “Reem,”
MICHAEL MERIN, and
TAMIKA BROWN,
a/k/a “Mika”**

shall forfeiture to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this indictment, including, but not limited to, the sum of \$1,300,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (dc) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 928(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
UNITED STATES ATTORNEY